

Fact Sheet



For Draft/Proposed Renewal Permitting Action Under 45CSR30 and Title V of the Clean Air Act

Permit Number: **R30-09700029-2011**

Application Received: **May 18, 2010**

Plant Identification Number: **03-54-097-00029**

Permittee: Weyerhaeuser NR Company

Facility Name: Buckhannon Facility

Mailing Address: 100 TJM Drive, Buckhannon, WV 26201

Physical Location:

Buckhannon, Upshur County, West Virginia

UTM Coordinates:

568.00 km Easting • 4316.50 km Northing • Zone 17

Directions:

From Charleston, take Interstate 79 North to the Buckhannon Exit (Exit 99), proceed east on State Route 33 East towards Buckhannon, approximately 14 miles, after passing by Route 20 (Phillipi/Buckhannon) Exit – Take the 2nd Exit on the left onto Industrial Park Road (Route 15/33) to the Morton Avenue exit (County Route 13). Continue on Industrial Park Road for approximately one (1) mile until coming to Stop sign. The plant is straight ahead.

Facility Description

Weyerhaeuser NR Company (Weyerhaeuser) is an engineered wood products facility covered by Standard Industrial Classification (SIC) Code 2493 and the North American Industry Classification System (NAICS) Code 321219. The facility has the potential to operate twenty-four (24) hours per day, seven (7) days per week and fifty-two (52) weeks per year. The facility consists of one (1) wood-fired furnace, one (1) propane furnace, two (2) veneer dryers, three (3) wood presses, four (4) storage tanks of various sizes, six (6) baghouse systems, one (1) ESP, and one (1) spray booth.

Emissions Summary

Plantwide Emissions Summary [Tons per Year]		
Regulated Pollutants	Potential Emissions	2009 Actual Emissions
Carbon Monoxide (CO)	185.67	3.636
Nitrogen Oxides (NO _x)	208.05	48.03
Particulate Matter (PM _{2.5})	12.23	1.778
Particulate Matter (PM ₁₀)	47.02	8.269
Total Particulate Matter (TSP)	202.67	31.793
Sulfur Dioxide (SO ₂)	8.76	0.104
Volatile Organic Compounds (VOC)	234.40	55.174
Lead (Pb)	1.49	0.04
PM ₁₀ is a component of TSP.		
Hazardous Air Pollutants	Potential Emissions	2009 Actual Emissions
Formaldehyde	6.79	1.67
Methanol	54.62	18.48
Phenol	0.37	0.122
Some of the above HAPs may be counted as PM or VOCs.		

Title V Program Applicability Basis

This facility has the potential to emit over 100 tons per year of Nitrogen Oxides (NO_x), Carbon Monoxide (CO) and Volatile Organic Compounds (VOC). Due to this facility's potential to emit over 100 tons per year of criteria pollutants, over 10 tons per year of a single HAP, and over 25 tons per year of aggregate HAPs, Weyerhaeuser NR Company is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

Legal and Factual Basis for Permit Conditions

The State and Federally-enforceable conditions of the Title V Operating Permits are based upon the requirements of the State of West Virginia Operating Permit Rule 45CSR30 for the purposes of Title V of the Federal Clean Air Act and the underlying applicable requirements in other state and federal rules.

This facility has been found to be subject to the following applicable rules:

Federal and State:	45CSR2	To Prevent and Control Particulate Air Pollution from Combustion of Fuel in Indirect Heat Exchanger
	45CSR6	Open burning prohibited.
	45CSR7	To Prevent and Control Particulate Air Pollution from Manufacturing Process Operations
	45CSR10	To Prevent and Control Air Pollution from the Emissions of Sulfur Dioxides
	45CSR11	Standby plans for emergency episodes.
	45CSR13	Permits for Construction, Modification, Relocation and Operation of Stationary Sources of Air Pollutants, Notification Requirements, Temporary Permits, General Permits, and Procedures for Evaluation.
	45CSR16	New Source Performance Standards
	WV Code § 22-5-4 (a) (14)	The Secretary can request any pertinent information such as annual emission inventory reporting.
	45CSR30	Operating permit requirement.

	45CSR34	Emission Standards for Hazardous Air Pollutants
	40 C.F.R. Part 60 Subpart Db	Standard of Performance for Industrial-Commercial-Institutional Steam Generating Units
	40 C.F.R. Part 60 Subpart Dc	Standard of Performance for Industrial-Commercial-Institutional Steam Generating Units
	40 C.F.R. Part 61 Subpart M	Asbestos inspection and removal
	40 C.F.R. Part 63 Subpart DDDD	National Emission Standards for Hazardous Air Pollutants: Plywood and Composite Wood Products
	40 C.F.R. Part 82 Subpart F	Ozone depleting substances
State Only:	45CSR4	No objectionable odors.
	45CSR2A	Testing, Monitoring, Record Keeping, and Reporting Requirements under 45CSR2.
	45CSR7A	Compliance Test Procedures 45CSR7. (Sections of this rule are Federally enforceable since those sections have been SIP.)
	45CSR10A	Testing, Monitoring, Record Keeping, and Reporting Requirements under 45CSR10.
	45CSR27	To Prevent and Control the Emissions of Toxic Air Pollutants. BAT required for emission of Toxic Air Pollutants above the given threshold. Also specifies reporting requirement for abnormal releases above a given amount.
	42CSR42	Greenhouse Gas Emissions Inventory Program

Each State and Federally-enforceable condition of the draft Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the draft Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the draft Title V permit as such.

The Secretary's authority to require standards under 40 C.F.R. Part 60 (NSPS), 40 C.F.R. Part 61 (NESHAPs), and 40 C.F.R. Part 63 (NESHAPs MACT) is provided in West Virginia Code §§ 22-5-1 *et seq.*, 45CSR16, 45CSR34 and 45CSR30.

Active Permits/Consent Orders

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit (<i>if any</i>)
R13-1843B	March 27, 2009	PD09-046

Conditions from this facility's Rule 13 permit(s) governing construction-related specifications and timing requirements will not be included in the Title V Operating Permit but will remain independently enforceable under the applicable Rule 13 permit(s). All other conditions from this facility's Rule 13 permit(s) governing the source's operation and compliance have been incorporated into this Title V permit in accordance with the "General Requirement Comparison Table B," which may be downloaded from DAQ's website.

Determinations and Justifications

Since R30-09700029-2005 (MM01) was issued, the only change to the Weyerhaeuser NR Company's Buckhannon Facility Title V Permit and Fact Sheet is the addition of NSR Permit Determination (PD09-046).

The following updates were made in the renewal.

1. NSR Permit Determination (PD09-046) is to increase the quality and recovery of the billets manufactured from the parallam press, which includes:
 - a. Addition of six magnetrons to supply microwave power
 - b. Upgrade the existing chilled water system
 - c. Addition of one new power transformer
 - d. Replace the existing press windows with an upgraded design
 - e. Upgrade the press to be able to run a 24 inch wide billet

An update of R13-1843B was not required since emissions will not increase.

2. The Emission Unit Table 1.0 was revised in accordance with Attachment D of Weyerhaeuser NR Company's Buckhannon Facility Title V Renewal Application.
3. Added Section 1.2, Active R13, R14, and R19 Permits and Table.
4. The regulatory language for Sections 3.1.1 and 3.1.2, 45CSR§§6-3.1 and 3.2, was updated.
5. 45CSR34 incorporates and is now cited with 40 C.F.R. Part 61 because 45CSR15 was repealed. The citation for 3.1.3 has been revised accordingly.
6. Section 3.1.5 was removed since the condition stated as "Reserved." The remaining sections were renumbered accordingly.
7. The average maximum temperature set point and the maximum average temperature range as stated in the R13-1843B for the Veneer Dryers could not be incorporated in the first Title V Permit renewal since VOC emissions testing was required (see Section 3.3.4.b.) before establishing new parameters ranges that will assure compliance with VOC limit in Section 3.2.2. Testing was conducted on August 17-24, 2010 for the average maximum temperature set point and the maximum average temperature range for each of the two-(2) wood veneer screen dryers. Based on the test, the set point in Section 3.1.28 was revised from 400 °F to 500 °F and in Section 3.3.4.b.ii the maximum average temperature range was revised from 350 to 450 °F to 300 to 550 °F. The citation for Section 3.1.28 was revised to "45CSR13, R13-1843, A.6, 003-01" from "45CSR§30-12.7, 003-01" to concur with the NSR permit, Condition A.6, because the required testing established the new the average maximum temperature set point.
8. Title V boiler plate was revised to incorporate the greenhouse gas language, 45CSR42, in Sections 3.1.32 and 3.5.11.
9. Since the facility determined that they are not subject to 40 C.F.R. Part 63 Subpart DDDD control requirements, the Notification of Compliance Status was not required and therefore, a complete Title V significant modification application was not required. Thus, Sections 3.1.31.a and 3.1.31.b were removed. The remaining sections were renumbered accordingly. However, the facility is required to show continuous compliance with the work practice requirements as stated in Section 3.1.33 for their hardwood veneer dryer and Group 1 miscellaneous coating operations and submit semiannual reports.

To show continuous compliance with the work practice requirements (see Section 3.1.33.) for the hardwood veneer dryer, the facility must maintain the volume percent of softwood species processed below 30% and keep records of the volume percent softwood species processed. Weyerhaeuser NR Company's Buckhannon Facility must submit semiannual reports per Section 3.4.8. For the hardwood veneer dryer work practices, see Section 3.4.9.

To show continuous compliance with the work practice requirements (see Section 3.1.33.) for Group 1 miscellaneous coating operations, the permittee must continue to use non-HAP coatings as defined in 40 C.F.R. § 63.2292 (see Section 3.1.33.) and keep records showing that the facility is

using non-HAP coatings. Weyerhaeuser NR Company's Buckhannon Facility must submit semiannual reports per Section 3.4.8. For the Group 1 miscellaneous coating operations work practices, see Section 3.4.9.

The facility initial notification for 40 C.F.R. Part 63 Subpart DDDD was received by WVDEP-Division of Air Quality on January 24, 2005.

10. The boilerplate language for Section 3.3.1 was revised with the addition of Section 3.3.1.d and the citation was also revised to expand the authority of the West Virginia state code.
11. In addition to deleting the first three rows of the tables in Sections 3.3.3 and 4.3.2 as described in items 12 and 15, the following changes were made (to the remaining rows of the tables):
 - a. In the second column of the third row below the table heading, the symbol " \leq " was added before "50%." The change was made to clarify the requirement.
 - b. A fourth row below the table heading was added to cover the possible mass emission testing result between 50 and 90%.
 - c. A sixth row below the table heading was added per the request of the permittee, which allows a frequency of testing of once/5 years if the previous test result was \leq 50% of the particulate matter, nitrogen oxides, carbon monoxide, and volatile organic compounds limits. This follows along with the tiered approach, based on the margin of compliance.
12. Removed the initial testing requirements in Section 3.3.3 table since they have been completed. The current PM test frequency for the veneer dryers, BGHS1, BGHS2A, and BGHS2B is Once/5 years, for BGHS3 and BGHS5 is Once/3 years, for BGHS4 was Annual but after three (3) successive annual tests were \leq 50%, the revised test frequency is Once/5 years.
13. Sections 3.5.3 and 3.5.5 were revised accordingly to US EPA Region 3 request that all annual compliance certifications be submitted electronically (e-mail). This is a general change to the boiler plate language.
14. Section 4.1.1 was added to incorporate the case-by-case MACT determination boilerplate language for WoodFurn (001-01) and StandbyFurn (001-02) since 40 C.F.R. Part 63 Subpart DDDDD was vacated and remanded. Because of recent news, the boiler MACT standardized language may change. Sections 4.1.1.a and 4.1.1.b were replaced with the revised boilerplate language in Section 4.1.1.
15. Removed the initial test requirements in Section 4.3.2 table for particulate matter (PM), carbon monoxide (CO), and volatile organic compounds (VOC) for the Wood Furnace and the Stand-by Furnace. The current nitrogen oxides (NO_x) testing frequency is Once/3 years for the Wood Furnace. The particulate matter (PM), carbon monoxide (CO), and Volatile Organic Compounds (VOC) testing frequency for the Wood Furnace is Once/5 years. The current nitrogen oxides (NO_x) and volatile organic compounds (VOC) testing frequency for the Stand-by Furnace is Once/5 years.
16. Due to the economic down turn, the Wood Fired Furnace (001-01) runs in an "idle" mode, especially on weekends and holidays, and the oxygen content goes above 15%, which is the allowable maximum percent (see Section 4.3.5.i.). The percent oxygen goes above 15 percent when there is no load on the furnace. Complete combustion is not achieved when the firebox temperature is 700 – 900 degrees F. The normal furnace temperatures are around 1,600 to 1,800 degrees F. To prevent thermal shock, the furnace is operated at no load instead of shutting down on weekends and holidays, then restarting the furnace at the beginning of a work week. This has been occurring for the past couple years, which has caused Weyerhaeuser to deviate from the permit term and reporting of these deviations has become very time consuming. Thus, "except during periods when the furnace is in an idle mode" was added to Section 4.3.5.i.

17. Weyerhaeuser NR Company has not made any modifications at the Buckhannon Facility that would trigger a PSD permit for a GHG Clean Act requirement.

40 C.F.R. Part 63 Subpart DDDDD - National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters

Weyerhaeuser NR Company's Buckhannon Facility submitted their initial notification requirements for Wood Fired Furnace (001-01) on March 3, 2005. The initial notification was received on March 10, 2005 by the Division of Air Quality. The Standby Furnace (001-02) was not subject to the Boiler MACT.

Removal of the 40 C.F.R. 63 Subpart DDDDD

The United States Court of Appeals for the District of Columbia Circuit on July 30, 2007 ruled the Boiler MACT, 40 C.F.R. Part 63 Subpart DDDDD, be vacated and remanded. As a result of the court's decision, a MACT for this source category will have to be implemented via a 112(j) case-by-case MACT determination or a subsequent 40 C.F.R. Part 63 proposal. Per DAQ's "Interim Guidance for Existing Sources – Boiler and Process Heater MACT Vacature," dated September 7, 2007, the DAQ does not intend to implement the provisions of the Boiler and Process Heater MACT for existing sources at this time. US EPA will be issuing guidance regarding the 112(j) case-by-case MACT determination of equivalent emission limitation in the future. Due to these facts, the 40 C.F.R. 63, Subpart DDDDD Boiler and Process Heater MACT placeholder language for WoodFurn (001-01) and StandbyFurn (001-02) in Sections 4.1.1.a and 4.1.1.b of the Title V Permit minor modification were removed from the Title V Permit renewal.

After consultation with US EPA Region III in which DAQ was informed that 112(j) applied to the vacated standard 40 C.F.R. 63, Subpart DDDDD, "National Emission Standards for Hazardous Air Pollutants for Industrial/Commercial/Institutional Boilers and Process Heaters", but that no date of becoming subject was known, the agency determined that inserting a permit condition to address this situation to allow for a permit application shield while US EPA was in the process of re-proposing and re-promulgating a MACT standard was a reasonable course of action and use of limited resources. The agency's current position to delay the 112(j) reviews is based on the September 10, 2009 order filed by the United States District Court for the District of Columbia for US EPA to issue a new Boiler and Process Heater MACT to be proposed by April 15, 2010 and promulgated by February 21, 2011; to maintain national consistency; and to most effectively use agency resources.

Non-Applicability Determinations

The following requirements have been determined not to be applicable to the subject facility due to the following:

45CSR17	Weyerhaeuser Buckhannon Facility is subject to 45CSR7 which exempts it from 45CSR17, To Prevent and Control Particulate Matter Air Pollution from Materials Handling, Preparation, Storage and Other Sources of Fugitive Particulate Matter, as stated in 45CSR§7-10.2.
45CSR21	Regulation to Prevent and Control Air Pollution from the Emission of Volatile Organic Compounds. Weyerhaeuser Buckhannon Facility is not located Cabell, Kanawha, Putnam, Wayne, or Wood counties.
45CSR33	Acid Rain Provisions and Permits do not apply to Weyerhaeuser Buckhannon Facility because it is not considered a Title IV (Acid Rain) Source.
40 C.F.R. Part 60 Subpart EE	Standards of Performance for Surface Coating of Metal Furniture. Weyerhaeuser Buckhannon Facility is not engaged in any form of metal furniture surface coating.
40 C.F.R. Part 60 Subpart MM	Standards of Performance for Automobile and Light Duty Truck Surface Coating Operations. Weyerhaeuser Buckhannon Facility is not engaged in the coating of automobiles or light-duty trucks.
40 C.F.R. Part 60 Subpart RR	Standards of Performance for Pressure Sensitive Tape and Label Surface Coating Operations. Weyerhaeuser Buckhannon Facility does not operate a coating line used in the manufacture of pressure sensitive tape and label materials.

40 C.F.R. Part 60 Subpart SS	Standards of Performance for Industrial Surface Coating: Large Appliances. Weyerhaeuser Buckhannon Facility is not engaged in the coating of large appliances.
40 C.F.R. Part 60 Subpart TT	Standards of Performance for Metal Coil Surface Coating. Weyerhaeuser Buckhannon Facility is not engaged in metal coil surface coating.
40 C.F.R. Part Subpart WW	Standards of Performance for the Beverage Can Surface Coating Industry. Buckhannon Facility is not engaged in beverage can surface coating.
40 C.F.R. Part 60 Subpart SSS	Standards of Performance for Magnetic Tape Coating Facilities. Buckhannon Facility is not engaged in coating continuous base film to produce magnetic tape.
40 C.F.R. Part 60 Subpart TTT	Standards of Performance for Industrial Surface Coating: Surface Coating of Plastic Parts for Business Machines. Weyerhaeuser Buckhannon Facility does not operate spray booths in which plastic parts for use in the manufacture of business machines receive prime coats, color coats, texture coats, or touch-up coats.
40 C.F.R. Part 63 Subpart H	National Emission Standards for Organic Hazardous Air Pollutants for Equipment Leaks. Buckhannon Facility does not have a piece of equipment that either contains or contacts a fluid (liquid or gas) that is at least 5 percent by weight of total organic HAP's.
40 C.F.R. Part 63 Subpart JJ	National Emission Standards for Wood Furniture Manufacturing Operations. Weyerhaeuser Buckhannon Facility is not engaged in the manufacture of wood furniture or wood furniture components and the facility is not a major source as defined in 40 C.F.R. § 63.2.
40 C.F.R. Part 63 Subpart KKKK	National Emission Standards for Surface Coating of Metal Cans. Weyerhaeuser Buckhannon Facility is not engaged in the manufacture of metal cans and the facility is not a major source as defined in 40 C.F.R. § 63.2.
40 C.F.R. Part 63 Subpart MMMM	National Emission Standards for Surface Miscellaneous Metal Parts. Weyerhaeuser Buckhannon Facility is not engaged in the manufacture of miscellaneous metal parts and the facility is not a major source as defined in 40 C.F.R. § 63.2.
40 C.F.R. Part 63 Subpart QQQQ	National Emission Standards for Surface Coating of Wood Building Products. Weyerhaeuser Buckhannon Facility is not engaged in the manufacture of wood building products and the facility is not a major source as defined in 40 C.F.R. § 63.2.
40 C.F.R. Part 63 Subpart SSSS	National Emission Standards for Metal Coil (Surface Coating). Weyerhaeuser Buckhannon Facility is not engaged in the manufacture of metal coil products and the facility is not a major source as defined in 40 C.F.R. § 63.2.
40 C.F.R. Part 64	This is the second permit renewal for this facility. The facility was found not to be subject to CAM at the time of the first renewal. Therefore, a CAM determination is not required.
40 C.F.R. Part 72	Acid Rain Program General Provisions does not apply to Weyerhaeuser because it is not considered a Title IV (Acid Rain) Source.

Request for Variances or Alternatives

None

Insignificant Activities

Insignificant emission unit(s) and activities are identified in the Title V application.

Comment Period

Beginning Date: February 7, 2011

Ending Date: March 9, 2011

All written comments should be addressed to the following individual and office:

Wayne Green
Title V Permit Writer
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304

Procedure for Requesting Public Hearing

During the public comment period, any interested person may submit written comments on the draft permit and may request a public hearing, if no public hearing has already been scheduled. A request for public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. The Secretary shall grant such a request for a hearing if he/she concludes that a public hearing is appropriate. Any public hearing shall be held in the general area in which the facility is located.

Point of Contact

Wayne Green
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: 304/926-0499 ext. 1258 • Fax: 304/926-0478

Response to Comments (Statement of Basis)

Not applicable at this time.

OR

Describe response to comments that are received and/or document any changes to the final permit from the draft/proposed permit.